

DANIEL R. LAPINSKI, ESQ. (DL/7447)

MOTLEY RICE LLC

Woodland Falls Corporate Park

210 Lake Drive East, Suite 101

Cherry Hill, NJ 08002

Telephone: 856-382-4670

Facsimile: 856-667-5133

Email: dlapinski@motleyrice.com

Attorneys for Talcum Powder Claimants

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	
LTL Management LLC	Chapter 11
	Case No. 23-12825-MBK

**APPLICATION FOR AN ORDER FOR ADMISSION *PRO HAC VICE* OF
JOHN A. BADEN IV**

Pursuant to Rule 101.1 of the Local Civil Rules for the U.S. District Court for the District of New Jersey and Rule 9010-1 of the U.S. Bankruptcy Court for the District of New Jersey, the undersigned counsel hereby seeks entry of an order granting the admission *pro hac vice* of John A. Baden IV, of the law firm Motley Rice LLC, 28 Bridgeside Blvd., Mt. Pleasant, South Carolina 29464 to represent Motley Rice LLC in the above Chapter 11 case on behalf of Talcum Powder Claimants.

In support of the application, counsel submits the attached Certification of John A. Baden IV and requests that the proposed form of order submitted herewith be entered.

The undersigned Counsel certifies that he is admitted and a member in good standing of the U.S. District Court for the District of New Jersey.

John A. Baden IV was admitted *pro hac vice* by Amended Order dated November 12, 2021, entered by the U.S. Bankruptcy Court for the Western District of North Carolina, and by Order dated December 16, 2021, entered by the U.S. Bankruptcy Court for the District of New Jersey in Case No. 21-30589, copies which are attached as Exhibit A.

Unless requested by other parties, no oral argument is requested. A proposed form of Order is submitted herewith.

Respectfully submitted,



DANIEL R. LAPINSKI, ESQ. (DL/7447)

dlapinski@motleyrice.com

MOTLEY RICE LLC

Woodland Falls Corporate Park

210 Lake Drive East, Suite 101

Cherry Hill, NJ 08002

Telephone: 856-382-4670

Facsimile: 856-667-5133

Dated: April 18, 2023

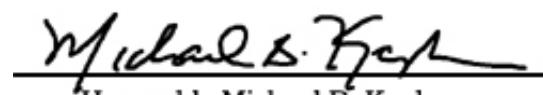
EXHIBIT A



UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) Greenbaum, Rowe, Smith & Davis LLP Nancy Isaacson, Esq. (NI/1325) 75 Livingston Avenue Roseland, New Jersey 07068 (973) 535-1600 nisaacson@greenbaumlaw.com Attorneys for Motley Rice, LLC	Order Filed on December 16, 2021 by Clerk Case No.: 23-30829 U.S. Bankruptcy Court District of New Jersey Chapter: 11 Judge: Michael B. Kaplan
In re: LTL MANAGEMENT, LLC, Debtor	ORDER FOR ADMISSION OF JOHN A. BADEN VI PRO HAC VICE

The relief set forth on the following pages 2 and 3 is **ORDERED**.

DATED: December 16, 2021



Honorable Michael B. Kaplan
United States Bankruptcy Judge

Debtor: LTL Management, LLC
Case No.: 21-30589 (MBK)
Caption: Order for Admission of John A. Baden IV *Pro Hac Vice*

This matter having been brought before the Court on application for an Order for Admission of John A. Baden IV *Pro Hac Vice*; and the Court having reviewed the moving papers of the application, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc. 78, D.N.J. L.Civ.R. 101.1 and D.N.J. LBR 9010-1, and good cause having been shown, it is

ORDERED that John A. Baden IV be permitted to appear *pro hac vice*, provided that pursuant to D.N.J. L.Civ.R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L.Civ.R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L.Civ.R. 101(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New

Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102
Attn: Pro Hac Vice Admissions

ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey; and it is further

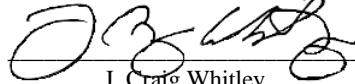
ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of the date of entry.



FILED & JUDGMENT ENTERED
Steven T. Salata

November 12 2021

Clerk, U.S. Bankruptcy Court
Western District of North Carolina


J. Craig Whitley
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re:
LTL MANAGEMENT LLC,¹
Debtor.

)
)
)
Chapter 11
Case No. 21-30589 (JCW)

**AMENDED ORDER GRANTING MOTION FOR ADMISSION PRO HAC VICE OF
JOHN A. BADEN IV**

THIS MATTER having come before the Court upon the Motion for Admission Pro Hac Vice of John A. Baden IV filed by Sara W. Higgins of Higgins & Owens, PLLC, for the admission pro hac vice of John A. Baden IV in the above-captioned case and in association with Sara W. Higgins, who is admitted to practice before this Court, as local counsel; and it appearing to the Court, and the Court so finding, that for good cause shown, the Motion should be granted;

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 5501 George Street, New Brunswick, New Jersey, 08933.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT, pursuant to Rule 2090-2 of the Local Rules of this Court, John A. Baden IV shall be, and hereby is, admitted pro hac vice to practice in this Court in the above-captioned chapter 11 case.

<i>This Order has been signed electronically. The Judge's signature and Court's seal appear at the top of this Order.</i>	<i>United States Bankruptcy Court</i>
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DANIEL R. LAPINSKI, ESQ. (DL/7447)

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Cherry Hill, NJ 08002

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Facsimile: 856-667-5133

Email: dlapinski@motleyrice.com

Attorneys for Talcum Powder Claimants

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re: LTL Management LLC	Chapter 11 Case No. 23-12825-MBK
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**CERTIFICATION OF JOHN A. BADEN IV IN SUPPORT OF HIS APPLICATION
FOR ADMISSION *PRO HAC VICE* PURSUANT TO RULE 9010-1(b)(2)**

JOHN A. BADEN, IV hereby certifies to this Court as follows:

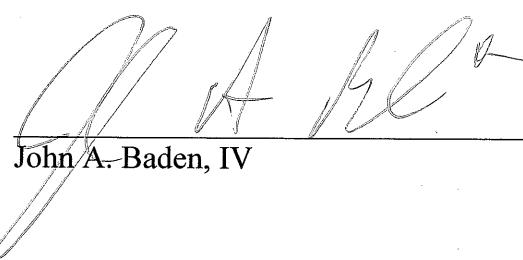
1. I am a partner at the law firm of Motley Rice LLC, which maintains principal law offices at 28 Bridgeside Blvd., Mt. Pleasant, South Carolina.
2. I am licensed to practice law and a member in good standing of the bar for the state of South Carolina. I was admitted to the bar for the state of South Carolina in 2002.
3. I am not under suspension, disbarment, or pending discipline in any court of jurisdiction in which I practice. In addition, I have never been sanctioned or subject to any disciplinary proceedings.

4. I understand any attorney admitted to practice *pro hac vice* within the Federal District Court for the District of New Jersey is subject to the disciplinary jurisdiction of the District Court and is bound by the Rules of Professional Conduct.

5. I previously filed an application to Appear *Pro Hac Vice* in the bankruptcy proceeding while the case was previously pending in the U.S. Bankruptcy Court for the Western District of North Carolina in Case No. 21-30589-MBK. On November 12, 2021, the Bankruptcy Court in North Carolina entered an Amended Order approving my admission in that Court and on December 16, 2021, I was admitted Pro Hac Vice in this Court in Case No. 21-30589-MBK. A request is now presented to request admission *pro hac vice* in this Court in matter Case No. 23-12825 for the purposes of participating in this bankruptcy case.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Dated: April 18, 2023



The image shows a handwritten signature in black ink, appearing to read "John A. Baden, IV". Below the signature is a horizontal line.

John A. Baden, IV

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Daniel R. Lapinski, Esq.
Motley Rice LLC
210 Lake Drive East, Suite 101
Cherry Hill, NJ 08002
Tel: 856-382-4670
Fax: 856-667-5133
Email: dlapinski@motleyrice.com
Attorneys for Talcum Powder Claimants

In Re:
LTL Management LLC

Case No.: 3:23-bk-12825-MBK
Adv. No.: 3:23-ap-1092-MBK
Chapter: 11
Judge: Michael B. Kaplan

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that John A. Baden IV be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

CERTIFICATE OF SERVICE

I hereby certify that, on this date, the foregoing document was filed with the United States Bankruptcy Court, District of New Jersey and served upon all parties entitled to receive notice of filings in the above-captioned case via the Bankruptcy Court's Electronic Case Filing (ECF) system.



By: _____
Daniel R. Lapinski, Esq.

Dated: April 18, 2023